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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ROWLAND MARCUS ANDRADE,  
  
Defendant.

Case No. 3:20-cr-00249-RS

**DEFENDANT ANDRADE'S MOTION FOR  
RECONSIDERATION OF COURT'S  
ORDER DENYING MOTION FOR AN  
EVIDENTIARY HEARING TO ADDRESS  
GOVERNMENT'S MISCONDUCT  
(ECF #535)**

Judge: Hon. Richard Seeborg, Chief Judge

Mr. Andrade requests, based on newly obtained evidence, that the Court reconsider its Order denying his request for an evidentiary hearing to address the government's misconduct.

- Defense counsel learned yesterday that, if the Court were to hold an evidentiary hearing, and if the FBI did not intervene to prevent him from testifying, Agent Buma would testify that notes taken by Jack Abramoff around May 31, 2018, while in a meeting with Ukrainian businessman Alexander Levin and Ukrainian billionaire Igor Kolomoisky, relate to two right-wing political campaigns Abramoff was running,<sup>1</sup> and that the notes mean the funding for these campaigns came from the promotion and sale of AML Bitcoin. *See* Declaration of Kerrie C. Dent at ¶¶ 3-4.
- Mr. Andrade also respectfully clarifies for the Court that the testimony of his other proffered witness, May Edwards, about “[t]he systematic suppression of information ... [she] witnessed at Treasury in 2016 through 2018 included information about potential international money laundering by Jack Abramoff,” also relates to this case. Her statement that Abramoff suppressed money laundering, “often us[ing] a shell company called Landfair Capital Consulting, LLC to hide the transactions,”<sup>2</sup> ties her testimony to this case because the Landfair Capital account, dubbed the “money connection” by the case agents when they were investigating Abramoff,<sup>3</sup> was used for purchases of AML Bitcoin made by Abramoff and his fellow miscreants and for certain AML Bitcoin expenditures,<sup>4</sup> and was also used to camouflage Abramoff's wrongdoing while he was working with AML Bitcoin. Dent Decl. at ¶5.

<sup>1</sup> Abramoff's two campaigns were the “Anti-Corruption” campaign (aimed at tying Joe Biden, Trump's chief political rival at the time, to corruption in Ukraine); and the “V/V” campaign (a pro-Russia, pro-Putin campaign). A key element to both campaigns was the use of media to spread the desired narrative. *See* Declaration of Kerrie C. Dent at ¶ 4.

<sup>2</sup> Agent Wynar stated this in an affidavit of probable cause to search PE's emails, and in a separate search warrant, Agent Wynar explained that Abramoff told FBI undercover agents on June 21, 2017, that “the secret Landfair Capital Consulting account” was designed to conceal his involvement in illegal lobbying activity. Declaration of Kerrie C. Dent in Support of Motion for Evidentiary Hearing, Exh. Y, FBI-302-014129 at ¶¶24.

<sup>3</sup> Recording 1D-39 (57:24) (FBI case agent Wynar calls the Landfair Capital account the “money connection”).

<sup>4</sup> Judge Beeler explained that one of the themes of Mr. Andrade's defense is as follows: “Abramoff [was] using Blockchain Entertainment, the television show about Mr. Andrade's business, Landfair Capital, and other entities, for his schemes about Mr. Andrade's business that were adverse to Mr. Andrade, at the same time that Abramoff was orchestrating the conduct for which Mr. Andrade has been charged.” Discovery Order, Dkt. # 165:7-10 (Apr. 7, 2023) (citing Def.'s Suppl. Reply Br., #159:10; Def's Suppl. Mem., #153:5).

1 For these reasons, and for all of the reasons set forth in Mr. Andrade's opening brief  
2 (Dkt. #499) and in his reply brief (Dkt #527), Mr. Andrade requests that the Court reconsider its  
3 denial of Mr. Andrade's motion for an evidentiary hearing (Dkt. #535) and hold an evidentiary  
4 hearing on the issue of the government's suppression of Abramoff-related documents and  
5 information relating to this case.

6 Respectfully submitted,

7 DATED: February 6, 2025

KING & SPALDING LLP

8 By: /s/ Michael J. Shepard  
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